

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

-----X		
BROADCAST MUSIC, INC.;)	
HOUSE OF CASH, INC.; ELIJAH BLUE)	Civil Action No.: 2:13-706-CWH
MUSIC, A DIVISION OF)	
LIGHTHOUSE, INC.; UNICHAPPEL)	
MUSIC, INC.; FOURTEENTH HOUR)	
MUSIC INC.; SPRINGTIME MUSIC,)	
INC.; BOCEPHUS MUSIC, INC.; RICH)	
WAY MUSIC, INC.; WARNER-)	
TAMERLANE PUBLISHING CORP.;)	
BUZZARD ROCK MUSIC; SONGS OF)	
UNIVERSAL, INC.,)	PLAINTIFFS' MOTION TO COMPEL
)	DISCOVERY RESPONSES
)	
Plaintiffs,)	
)	
v.)	
)	
MAIN STREET BAR & GRILL, INC.)	
d/b/a MAIN STREET BAR AND GRILL)	
and GEORGE D. ALBERS,)	
)	
Defendants.)	
-----X		

Pursuant to Rule 37 of the Federal Rules of Civil Procedure and Rule 37.01 of the Local Rules of this Court, Plaintiffs move the Court to compel Defendant to provide responses to Plaintiffs' First Set of Interrogatories (Exhibit 1) and First Request for Production of Documents (Exhibit 2) (collectively, "Discovery Requests") served upon Plaintiff. Per agreement of the parties entered into pursuant to Local Civil Rule 29.01, the responses to the Discovery requests were due on January 14, 2015. To date, Plaintiff has not served responses. The parties have discussed this matter to attempt to resolve it but were unsuccessful in doing so.

WHEREFORE, Plaintiff prays that the relief requested herein be granted.

Respectfully submitted,

/s/ Bernie W. Ellis

Bernie W. Ellis

McNair Law Firm, P.A.

Poinsett Plaza

104 South Main Street, 7th Floor

Greenville, SC 29601

Tel: (864) 271-4940

Fax: (864) 271-4015

E-Mail: bellis@mcnair.net

Attorneys for Plaintiffs

January 22, 2015